

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

JPMORGAN CHASE BANK, N.A.,

Plaintiff,

v.

CHARLIE JAVICE, OLIVIER AMAR,
CHARLIE JAVICE, in her capacity as Trustee
of CHARLIE JAVICE 2021 IRREVOCABLE
TRUST #1, CHARLIE JAVICE, in her
capacity as Trustee of CHARLIE JAVICE
2021 IRREVOCABLE TRUST #2, and
CHARLIE JAVICE in her capacity as Trustee
of CHARLIE JAVICE 2021 IRREVOCABLE
TRUST #3,

Defendants.

C.A. No. 22-01621-MN

PUBLIC VERSION

**PLAINTIFF’S MOTION TO PARTIALLY LIFT THE PRIVATE SECURITIES
LITIGATION REFORM ACT DISCOVERY STAY**

JPMorgan Chase Bank, N.A. (“Plaintiff”) hereby moves to lift the general discovery stay under the Private Securities Litigation Reform Act of 1995 to conduct limited, particularized discovery targeting Defendant Charlie Javice’s transfer of proceeds from the merger at issue in this litigation and failure to preserve evidence. The bases for this Motion are set forth in Plaintiff’s Opening Brief and upon the papers, records, and pleadings on file with the Court.

Pursuant to LR 7.1.1, counsel for the parties conferred by telephone, but were unable to reach agreement on this motion.

POTTER ANDERSON & CORROON LLP

OF COUNSEL:

William M. Regan
Allison M. Wuertz
HOGAN LOVELLS US LLP
390 Madison Avenue
New York, NY 10017
(212) 918-3000

Dated: April 7, 2023
Public version dated: April 10, 2023
10734091

By: /s/ Jonathan A. Choa
Peter J. Walsh, Jr. (#2437)
Michael A. Pittenger (#3212)
Jonathan A. Choa (#5319)
Carla M. Jones (#6046)
Hercules Plaza
P.O. Box 951
Wilmington, DE 19899
(302) 984-6000
mpittenger@potteranderson.com
pwalsh@potteranderson.com
jchoa@potteranderson.com
cjones@potteranderson.com

Attorneys for JPMorgan Chase Bank, N.A.